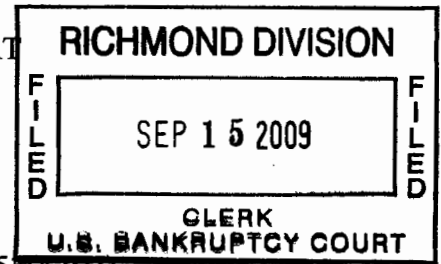


UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION



In re: CIRCUIT CITY STORES, INC., et al.,
Debtors.

Chapter 11

Case No. 08-35653(KRH)

Jointly Administered

**RESPONSE OF AMORE CONSTRUCTION COMPANY
TO THE DEBTORS' THIRTY-THIRD OMNIBUS OBJECTION TO CLAIMS
(MODIFICATION AND/OR RECLASSIFICATION OF CERTAIN CLAIMS)**

Amore Construction Company ("Amore" or "Claimant"), a creditor and parties in interest, by and through its undersigned counsel files this response (the "Response") to the Debtors' Thirty-Third Omnibus Objection to Claims (Modification and/or Reclassification of Certain Claims) (Dkt. No. 4590) (the "Objection") and would state as follows:

1. On January 26, 2009, Amore filed a proof of claim in the Circuit City Stores Inc.'s (the "Debtor") bankruptcy case, Case No. 08-35653, for the total amount of \$894,082.30, which claim was recorded on the Debtors' official claim register as Claim No. 7295 (the "Claim").
2. Amore's asserts as a secured claim in the amount of \$886,062.30, and, to the extent that the value of the collateral securing the secured claim is insufficient to satisfy the secured claim, an unsecured claim for the balance due. In addition, Amore asserted an additional unsecured claim in the amount of \$8,020.00. The Claim is asserted as a secured claim as a result of claim of lien filed on certain real properties on which the Debtor was a lessee on three separate projects in the State of Florida. To the extent that the Debtor has assumed and/or assigned its leasehold interest, Amore's claim of lien should attach to the proceeds. Further, to the extent that there are due payment to the Debtor from the developers of the various projects for completing the construction and/or build out of the leased space, Amore asserts a secured

claim to such proceeds. Due to the voluminous nature of the documents to support the Claim of Lien, a summary of the supporting documents was attached to the Claim.

3. The person with personal knowledge of the relevant facts to support the Claim and this Response is David Amore, Amore Construction Company, 8409 Laurel Fair Circle, Suite 103, Tampa, Florida 33610, phone: (813) 246-4200; facsimile (813) 246-4300. Mr. Amore can be contacted through his undersigned counsel.

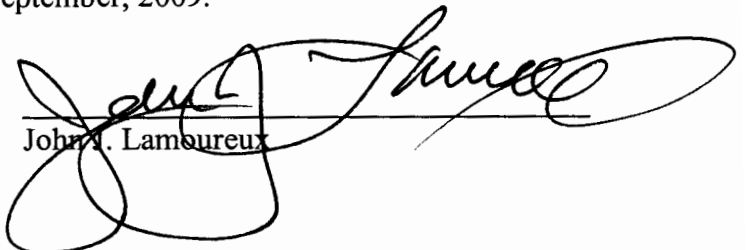
4. To the extent the leases have been assumed and/or assigned by the Debtor, and/or there is additional payments due the Debtor from the developers of the various projects for completing the construction and/or build out of the leased space, the liens are valid and encumber the Debtor's leasehold interest or the proceeds thereof. To the extent the leases have been rejected and no additional payments are due the Debtor, the claim is an unsecured claim.

5. All future notices and communications should be addressed to both:

David Amore
Amore Construction Company
8409 Laurel Fair Circle, Suite 103
Tampa, FL 33610
Phone: (813) 246-4200
Facsimile: (813) 246-4300
Email: david@amoreconstruction.com
And

John J. Lamoureux, Esq.
Carlton Fields, P.A.
P. O. Box 3239
Tampa, FL 33613
Phone: (813) 223-7000
Facsimile: (813) 229-4133
Email: jlamoureux@carltonfields.com

Respectfully submitted this 14th day of September, 2009.


John J. Lamoureux

Florida Bar Number 835218
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Attorneys for Amore Construction Company

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Response of Amore Construction Company to the Debtor's Thirty-Third Omnibus Objection to claims (Modification and/or Reclassification of Certain Claims) has been furnished via facsimile and by U.S. Mail to: Skadden, Arps, Slate, Meagher & Flom, LLP, One Rodney Square, P. O. Box 635, Wilmington, Delaware 19899-0636, Attn: Gregg M. Galardi, Esq. and Ian S. Fredericks, Esq., Skadden, Arps, Slate, Meagher & Flom, LLP, 155 North Wacker Drive, Chicago, Illinois 60606, Attn: Chris L. Dickerson, Esq., McGuire Woods, LLP, One James Center, 901 E. Cary Street, Richmond, Virginia 23219, Attn: Dion W. Hayes, Esq. and Douglas M. Foley, Esq. on this 14th day of September 2009.


Attorney

ATLANTA
MIAMI
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ST. PETERSBURG
TALLAHASSEE
TAMPA
WEST PALM BEACH

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September 14, 2009

Clerk, U.S. Bankruptcy Court
701 East Broad Street, Suite 4000
Richmond, VA 23219-1888

VIA FEDERAL EXPRESS

**Re: In re: Circuit City Stores, Inc., et al.
Case No.: 08-35653; Chapter 11**

Dear Sir or Madame:

As I have limited filing privileges and pursuant to my assistant's telephone conversation with Ms. Jones in the help desk, enclosed for filing please find an original and one copy of a *Response of Amore construction Company to the Debtors' Thirty-Third Omnibus Objection to claims (Modification and/or Reclassification of Certain Claims)* to be filed in the above-referenced case. Please stamp the copy to acknowledge receipt and return in the enclosed self-addressed stamped envelope.

Should you have any questions, please feel free to contact me. Thank you for your assistance.

Sincerely,


John A. Lamoureux

JJL/lmm
Enclosures